

# Information on the processing of personal data in the form of photos and video/audio recordings on the website and social media pages of Heinrich Heine University Düsseldorf

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January 2026

Heinrich Heine University Düsseldorf (hereinafter HHU) provides these data protection notes in order to fulfil its duty to supply information on the processing of personal data stated above pursuant to Art. 13 of the General Data Protection Regulation (GDPR).

You can find further information in the HHU privacy statement (<https://www.hhu.de/datenschutzklarung> – German only).

Please refer to the definitions in Art. 4 GDPR with regard to the terms “personal data”, “processing”, “controller”, “third party”, etc. used here.

## 1. Contact details

The controller for the processing is Heinrich Heine University Düsseldorf, a corporate body under public law (*Körperschaft des Öffentlichen Rechts*) supported by the State of North Rhine-Westphalia (NRW). It is represented by the President, Professor Dr Anja Steinbeck.

### 1.1 Contact details of the controller

Heinrich Heine University Düsseldorf  
Universitätsstr. 1  
40225 Düsseldorf, Germany  
Tel.: +49 211 81-10000  
[www.hhu.de](http://www.hhu.de)

### 1.2 Contact for the processing

Press and Communications Unit/Events, Marketing and Fundraising Unit  
Tel.: +49 211 81-12022 or 81-15929.  
E-mail: [kommunikation@hhu.de](mailto:kommunikation@hhu.de)

### 1.3 Contact details of the Data Protection Officer

You can contact the official HHU Data Protection Officer by post at the address of the controller stated above or via the following means:

Tel.: +49 211 81-13060

E-mail: [datenschutz@hhu.de](mailto:datenschutz@hhu.de)

<https://www.hhu.de/en/about-hhu/organisation-and-bodies/central-university-administration/staff-units/data-protection-unit>

## 2. Information on the personal data processed

Within the framework of the processing of photos and video/audio recordings on the website, in print media and on the social media pages of HHU, the following personal data from you are processed:

- Photos (individual/group photos)
- Videos (individual/group recordings), video statements, interviews
- Audio and voice recordings (e.g. podcast contributions)
- First and last name or user name where applicable
- Subject, number of semesters and (career) development/résumé where applicable
- Publications or publication lists where applicable
- Employee status, department where applicable
- E-mail, telephone number (exclusively for contact purposes, no transfer to third parties)

## 3. Purposes of and legal basis for the processing

Your personal data are processed on the basis of the provisions of the GDPR, the state Data Protection Act (*Landesdatenschutzgesetz*) and the German Art Copyright Act (*Kunsturhebergesetz* – KUG) for the following purposes:

- a) The individual and/or group photos of people, University members or (parts of) a department serve to enhance or complete the website and print media, as well as the purpose of representation and current reporting about HHU in internal and external media.
- b) Photos and video/audio recordings on the HHU social media pages also serve to enhance the presence and provision of information to the public through up-to-date reporting and the (inter)national representation of HHU.

The legal basis for the processing of individual and group photos on the website and on social media, which depict the character of the event and where you as a person play only a minor role is Art. 6 (1) e. and (3) GDPR in conjunction with Art. 8 (6) of the Higher Education Act of North Rhine-Westphalia (*Hochschulgesetz NRW* – HG NRW) in conjunction with Art. 3 of the Data Protection Act for the State of North Rhine-Westphalia (*Datenschutzgesetz Nordrhein-Westfalen* – DSG NRW).

The legal basis for the processing of other individual and group photos on the Intranet, website and social media pages is your declaration of consent pursuant to Art. 6 (1) a. GDPR and Art. 22 KUG.

In the event that a model release agreement has been concluded, the legal basis for the processing of individual and group photos is Art. 6 (1) b. GDPR.

#### **4. Transfer of personal data**

In individual cases, we transfer your personal data processed by HHU for the purposes stated under Section 3a to external press portals/representatives for the purposes of general reporting.

We must point out that the IT departments or a service provider may have access to the data within the framework of servicing and maintenance work.

The photos and video/audio recordings stated under 3b are uploaded to the social media pages and consequently transferred to the operators of the networks.

It is also in the nature of such things that your personal data are available to the public when they are published on the Internet and on social media, meaning that these data may be taken by third parties at any time. In this context, we would like to point out the following information:

##### **Information on the publication of personal data on the HHU website:**

Where personal data including photo and video material are published on the HHU website and social media pages, they may be accessed and saved worldwide. Where photos and videos in which you appear are displayed, they can be accessed worldwide – also in countries that do not offer an adequate level of data protection. The data are generally accessible to the public and may therefore also be found via so-called “search engines”. In this case, it cannot be excluded that other people or organisations combine the data with other personal data available on the Internet and use this information e.g. to create a personality profile or for other purposes. There is also a risk of commercial use by third parties and a risk that the data may then also continue to be used even after HHU has modified or deleted its website content.

##### **Information on the publication of personal data on social media:**

You can find information on the use of your personal data during the use of Mastodon here: <https://nrw.social/privacy-policy> (Mastodon, German only, HHU channel on hold).

We explicitly point out that the social media platforms stated below store the personal data of their users (e.g. IP address, information about the end device used, location, information about the mobile telephone company or network, information about the websites accessed and other data) in accordance with their data policies and use them for commercial purposes. Where personal data including image material are published on social media, the data may be transferred to third countries, in particular the USA.

HHU has no influence over the collection and further processing of data by social media. These platforms determine the scope and duration of data storage, which data analyses are carried out, how data are linked and who the data are transferred to.

You can find more information on the data processing carried out by the individual companies in their data policies at:

<https://www.facebook.com/policy.php> (Facebook, German only)

<https://www.linkedin.com/legal/privacy-policy?l=de.De> (LinkedIn)

<https://x.com/en/privacy> (X, HHU channel discontinued)

<https://policies.google.com/privacy?hl=de> (YouTube)

<https://privacycenter.instagram.com/policy> (Instagram, German only)

<https://www.tiktok.com/legal/page/eea/privacy-policy/en> (TikTok)

<https://bsky.social/about/support/privacy-policy> (Bluesky)

<https://help.instagram.com/515230437301944> (Threads)

The data transfer to LinkedIn and Google in the USA occurs on the basis of the EU adequacy decision/U.S. Data Privacy Framework pursuant to Art. 45 GDPR.

No adequacy decision exists for the other companies. This means that an adequate level of data protection cannot be guaranteed during the use of Facebook, X, Instagram, TikTok, Bluesky and Threads.

## **5. Duration of processing/data erasure**

HHU shall store your personal data only for as long as is necessary to fulfil the purposes pursuant to Section 3, contractual obligations or statutory obligations. These data shall then be erased.

HHU shall erase photos and video/audio recordings from the website and social media pages if you withdraw your consent to their processing or, in the case of group photos or videos, when the first data subject withdraws their consent. In the case of group photos or videos, the data subject may also be made unrecognisable.

## **6. Your rights as the data subject**

As the data subject, you may assert the rights granted to you under the EU GDPR at any time:

- The right to information about whether your personal data are processed and, if so, which data (Art. 15 GDPR). The restrictions set out in Art. 12 DSG NRW shall apply
- The right to demand rectification or completion of the data concerning you (Art. 16 GDPR)
- The right to erasure of the data concerning you pursuant to Art. 17 GDPR. The restrictions set out in Art. 10 DSG NRW shall apply
- The right to demand restriction of the data processing pursuant to Art. 18 GDPR
- The right to object to any future processing of the data concerning you pursuant to Art. 21 GDPR

- The right to withdraw consent at any time. This shall not affect the lawfulness of processing based on consent before its withdrawal (Art. 7 (3) GDPR)

You also have the right to lodge a complaint with a supervisory authority pursuant to Art. 77 GDPR if you believe that the processing of the personal data concerning you violates the GDPR. The supervisory authority in NRW responsible for HHU is the

State Commissioner for Data Protection and Freedom of Information for the State of North Rhine-Westphalia

Kavalleriestrasse 2 – 4

40213 Düsseldorf, Germany

Tel.: +49 211 38424-0

E-mail: [poststelle@ldi.nrw.de](mailto:poststelle@ldi.nrw.de)

We would however be grateful if you could contact our Data Protection Officer before lodging a complaint with the supervisory authority. We will do our best to solve the issue.

## **7. Validity of these data protection notes**

We reserve the right to amend these data protection notes where necessary to ensure compliance with amendments to relevant laws or regulations, or to better meet your needs. The latest version of these data protection notes as published by HHU shall apply.